

PRAYER

WHEREFORE, PREMISES CONSIDERED, Defendant Berkley respectfully requests dismissal of Plaintiff's claims against it for failure to state a claim and for any such other and further relief to which it may be justly entitled.

Respectfully submitted,

/s/ Jennifer G. Martin

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COMPANY, BERKLEY NATIONAL
INSURANCE COMPANY F/K/A UNION
STANDARD INSURANCE COMPANY, AND
CHRISTOPHER LEE MICHELS**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document has been forwarded to the following counsel of record in accordance with the Federal Rules of Civil Procedure, on this 29th day of September, 2017.

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